1	NICHOLAS A. TRUTANICH	
2	United States Attorney Nevada Bar Number 13644	
_	ELIZABETH O. WHITE	
3	Assistant United States Attorney	
4	400 South Liberty #900 Reno, Nevada 89501	
	Elizabeth.O.White@usdoj.gov	
5	775-784-5438 Attorneys for the United States	
6	Thomas for the Onnea States	
7	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
8		
9	UNITED STATES OF AMERICA,	) Case No 2:16-CR-52-GMN-CWH
10	Plaintiff,	<ul><li>Stipulation to Extend Time for</li><li>Government's Response to Defendant's</li></ul>
11	VS.	) Compassionate Release Motion
12	DYWON JOHNSON,	)
13	Defendant.	) )
14		_)
15	IT IS HEREBY STIPULATED AND AGREED, by and between Assistant United	
16	States Attorney Elizabeth O. White, counsel for the United States of America; and	
17	Jacqueline Tirinnanzi, Esq., counsel for Dywon Johnson, that the government's response	
18	to Mr. Swanson's Second Motion for Compassionate Release (ECF No. 321) be extended	
19	by 11 days, to and including December 14, 2020.	
20	This stipulation is entered into for the following reasons:	
21	1. Mr. Johnson filed his motion on Thanksgiving Day, November 26, 2020.	
22	ECF No. 321.	
23		
24		

2. Pursuant to the District Court's General Order regarding such motions, the government's response is due seven days after the motion is filed, which is December 3, 2020.

- 3. Government counsel was out of the office over the Thanksgiving weekend, returning on Monday, November 30. She is now preparing for a Ninth Circuit oral argument scheduled for December 8, 2020, as well as preparing responses to several other compassionate release motions that were filed Thanksgiving week. In light of this work, the government believes it will need additional time, to and including December 14, 2020, to review Johnson's motion, related medical records, and other records, and prepare and file the government's response.
  - 4. Johnson's counsel consents to this extension of time.

    DATED this 30th day of November, 2020.

RENE L. VALLADARES Federal Public Defender

NICHOLAS A. TRUTANICH United States Attorney

By: <u>s/Jacqueline Tirinnanzi</u> Jacqueline Tirinnanzi, Esq. Counsel for Dywon Johnson

By: s/ Elizabeth O. White
Elizabeth O. White
Assistant United States Attorney
Counsel for the United States

## 1 UNITED STATES DISTRICT COURT 2 **DISTRICT OF NEVADA** 3 4 UNITED STATES OF AMERICA, Case No.: 2:16-CR-52-GMN-CWH 5 Plaintiff, (Proposed) 6 VS. **ORDER** 7 DYWON JOHNSON, 8 Defendant. 9 10 Based on the Stipulation of counsel and good cause appearing, 11 IT IS THEREFORE ORDERED that the government's response to Defendant's 12 Motion for Compassionate Release (ECF No. 321) be due on December 14, 2020. 13 14 DATED this \_1\_ day of December, 2020. 15 16 17 Gloria M. Navarro, District Judge UNITED STATES DISTRICT COURT 18 19 20 21 22 23 24